

UNITED STATES DISTRICT COURT  
for the  
District of Connecticut

United States of America

v.

Jesse Osmun

Case No.

*Defendant*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of January 2010 in the county of New Haven in the \_\_\_\_\_ District of  
Connecticut, the defendant violated 18 U. S. C. § 2423(c)  
, an offense described as follows:  
Engaging in illicit sexual conduct in foreign places.

This criminal complaint is based on these facts:

See Attached Affidavit of Special Agent Joyce A. Shores and Rod Khattabi dated August 4, 2011

☒ Continued on the attached sheet.

  
Complainant's signature


Joyce A. Shores, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 08/04/2011

City and state: Bridgeport, CT

  
Judge's signature

Hon. Holly B. Fitzsimmons, USMJ

*Printed name and title*

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

IN RE: APPLICATION FOR \_\_\_\_\_ :  
ARREST WARRANT \_\_\_\_\_ : NO. 3:11 \_\_\_\_\_(HBF)

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**AFFIDAVIT**

1. I, Joyce A. Shores, being duly sworn, deposes and state that I am a co-affiant of the warrant application and am a Special Agent with the Peace Corps Office of Inspector General (OIG) since November of 2008. I was previously employed for eighteen and one-half years as a Special Agent with Immigration and Customs Enforcement (ICE, previously the U.S. Customs Service). As a Special Agent with ICE, I conducted many federal investigations including violations of laws involving narcotics, fraud, money laundering and child exploitation. In furtherance of child exploitation investigations, I drafted affidavits and executed federal search warrants to obtain evidence from the residences and computers of persons suspected of sexually exploiting children. In addition, from 2003 to 2006, I was assigned as a National Program Manager at the ICE Cyber Crimes Center. In this position, I investigated the possession, distribution and production of child pornography involving the use of the Internet. I have also attended numerous conferences and obtained specialized training in child exploitation and Internet investigations. I graduated from the Criminal Investigator Training Basic Program and the U.S. Customs Special Agent Training Program at the Federal Law Enforcement Training Center in Brunswick, Georgia. I have a Bachelor of Science degree in Psychology from Syracuse University. Additionally, I have both a Master of Science degree in Industrial Psychology and a

Masters of Public Administration degree from California State University.

2. Peace Corps' OIG was established on January 23, 1989, and became effective on April 16, 1989 pursuant to enactment of P.L. 100-504, the "Inspector General Act Amendments of 1988" (The Act). The Act authorizes the Peace Corps OIG to conduct investigations of the "administration of the programs and operations of the applicable establishment as are, in the judgment of the Inspector General, necessary or desirable."

3. In July 2010, Attorney General Eric H. Holder, Jr. authorized OIG to exercise statutory law enforcement powers pursuant to Section 6(e) of the Inspector General Act of 1978, as amended and in accordance with the Attorney General Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority. With this authority I am empowered, upon probable cause, to seek and execute warrants for arrest, search premises or seize evidence, make arrests without a warrant while engaged in official duties, and carry firearms. I am an investigative or law enforcement officer of the United States Government and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18 of the United States Code.

4. I, Rod Khattabi, being duly sworn, deposes and state that I am a co-affiant of this warrant application and am a Special Agent of the United States Homeland Security Investigations (HSI) since 2003. Prior to that I was a Special Agent with the U.S. Customs Service since 1997. Prior to 1997, I was a Special Agent with Internal Revenue Service, Criminal Investigations Division. I am currently assigned to the New Haven Residency Office of ICE. As a Special Agent with HSI, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States. I have

been involved in multiple investigations related to the sexual exploitation of children including internet child pornography cases. I have successfully investigated possession, distribution and production of child pornography. I have also successfully investigated and prosecuted sex tourism cases involving Americans who travel abroad and sexually exploit children. Finally, I have received formal training in the area of child pornography and child exploitation.

5. We are investigative or law enforcement officers of the United States within the meaning of 18 U.S.C. § 3061, and are empowered by law to conduct investigations and to make arrests for offenses enumerated in 18 U.S.C. § 2423, and other federal offenses.

6. Section 2423(c) makes it unlawful for any United States citizen or alien admitted for permanent residence to travel in foreign commerce, and engage in any illicit sexual conduct with another person.

#### Description of Individual

7. We make this affidavit in support of an application for a warrant to arrest Jesse Osmun (“Osmun”), a white male, whose date of birth is [Redacted] 1979 and who resides at [Redacted] [Redacted] Milford Connecticut. Jesse Osmun is a United States citizen.

8. Based on the facts set forth below, we submit that there is probable cause to believe and we do believe that Osmun is a United States citizen who traveled to South Africa to work for the Peace Corps in 2010 and sexually molested multiple children in South Africa in 2010 and 2011 when he worked as a Peace Corps volunteer in violation of 18 U.S.C. § 2423.

9. To date, we have directed the investigation which is the subject of this affidavit, in conjunction with members of South African Police Service (SAPS), ICE’s attaché office in Pretoria, South Africa, ICE Cybercrimes Center located in Fairfax, Virginia, the United States

Department of State's regional security office located in Durban, South African. We both have participated in this investigation and, as a result of this participation, as well as information provided by other law enforcement officers, we are thoroughly familiar with the information contained herein.

10. The statements in this affidavit are based in part on information provided by Officers and Special Agents of Homeland Security Investigations (HSI), SAPS, other law enforcement officers, and on our own investigation. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, we have not included each and every fact known to us concerning this investigation. We have set forth only the facts that we believe are necessary to establish probable cause to believe

#### **BACKGROUND OF THE INVESTIGATION**

11. The Peace Corps is a U.S. government agency that supports approximately 8,655 volunteers, serving 76 countries worldwide. Although volunteers are not government employees, they do take an oath of office after completing a three-month in-country training program. In South Africa, there are about 152 volunteers working in the areas of education, health, and HIV/AIDS awareness. The volunteers are supported in their mission by about 40 Peace Corps employees and contractors under the direction of the Peace Corps/South Africa Country Director (CD).

12. On June 7, 2011, CD contacted Peace Corps OIG to report possible child exploitation violations involving now former Peace Corps volunteer Jesse Osmun. CD informed S/A Shores that Osmun had arrived in South Africa on January 29, 2010, was sworn in as a

volunteer on March 25, 2010, and on March 25, 2010, Osmun traveled to the Umvoti Aids Center (UAC) in Greytown, South Africa to begin his service as a volunteer. The UAC is a non-governmental organization that provides support to the residents of the Greytown area affected by the AIDS virus. UAC also provides education, food, and other child development services to children ranging in ages of approximately three years old to fifteen years old. There is a center for the younger children often referred to as the pre-school. Many of the older children take part in a scouting program where they are offered extra-curricular activities with the South African Scouting Association. U.S. Customs and Border Protection travel records show that on January 28, 2010, Osmun traveled to South Africa from Washington Dulles International Airport located in Chantilly, Virginia and returned from South Africa on June 2, 2011. Osmun entered the United States via Atlanta Hartsfield International Airport located in Atlanta, Georgia.

13. CD told S/A Shores that on May 26, 2011, Osmun asked to resign from the Peace Corps, and on June 1, 2011, he left South Africa. CD advised that on June 7, 2011, after Osmun left South Africa, the UAC director told CD that Osmun had sexually assaulted a child at the UAC preschool.

14. On June 14, 2011, S/A Shores traveled to Greytown, South Africa and interviewed UAC staff. Through a (Zulu/English) translator, a UAC preschool teacher told S/A Shores that on May 24, 2011, she saw Osmun follow three young girls, Minor #1, Minor #2, and Minor #3, into the UAC pre-school building. After a few minutes, the pre-school teacher went into the school and observed Osmun in the toy room of the pre-school with the three girls. The pre-school teacher said that Osmun appeared startled and zipped up his pants. Osmun had his back to her, and one of the girls was standing near him. The pre-school teacher informed S/A

Shores that after Osmun left the room, she asked the children what had happened. Minor #1 told her that “uncle,” referring to Osmun, had given candy to Minor #2 for “sucking” on his penis.

15. On June 14, 2011, S/A Shores interviewed the UAC program manager. The UAC program manager told S/A Shores that on May 26, 2011, he confronted Osmun about what had occurred with the three minors. Osmun initially denied any exploitation but subsequently admitted that he had touched one of the children under her clothes. Osmun also admitted that he was attracted to children and he had known for some time about his interest in children. Osmun further stated that when he was under stress, he was unable to control his “dreams” about children.

16. On June 14, 2011, S/A Shores interviewed a UAC scout master. Through a translator, a UAC scout master told S/A Shores that on one occasion several months ago, some of the older children (approximately 11 - 15 years old) in the scouting program told him that they saw that Osmun had an erection after a young girl, Minor #4, sat on his lap.

17. According to information and official documents, Minor #1, Minor #2, Minor #3, and Minor #4 are all under six years old.

18. On June 20, 2011, S/A Shores informed SAPS about the allegations against Osmun and subsequently a SAPS captain was assigned to investigate the matter. On June 28 and 29, 2011, S/A Shores was present when the SAPS captain interviewed Minor #1 and Minor #4 at the UAC. The interviews were conducted in Zulu, and an English translator was present.

19. Minor #1, who is approximately 5 years old, provided the following information through a translator:

After viewing a photograph of Osmun, Minor #1 referred to Osmun as “uncle” and stated that Osmun used to work at the school. Minor #1 said that once while in the toy room of the pre-school, “uncle” pulled down his zipper and both Minor #2 and Minor #3 “sucked” his penis. Afterward, he gave candy to Minor #3. Further, “uncle’s” penis was “white and hard.” When some “milk” came out of it, he used a tissue to clean it up. Minor #1 said that when her teacher came in, he zipped up his pants and left the room.

20. Minor #4 provided the following information through a translator:

The SAPS captain showed a picture of Osmun to Minor #4. Minor #4 said that she knew him and referred to him as “uncle.” Minor #4 said that on more than one occasion, “uncle” had shown his penis to her, and asked her to pull his penis out of his pants and touch it. Minor #4 said she had touched “uncle’s” penis. Minor #4 said that she would hold “uncle’s” penis for quite a long time and he would put his hand over hers and move her hand on his penis. She described his penis as “full and white,” and said that “uncle” gave candy to her for touching him. In reference to one occasion, Minor #4 said that “uncle” also guided her own hand down her pants to touch herself between the legs. Minor #4 said that this contact between her and “uncle” occurred in the classroom.

21. Prior to leaving South Africa, UAC director reported to S/A Shores that she confronted Osmun about the events that had occurred and stated to Osmun that she believed that he was a child molester and that he needed to get help. In summary, Osmun responded by agreeing to seek help and indicated that he knew what he did was wrong and that he would inform his father about what he had done.

22. On August 4, 2011, we traveled to Milford, Connecticut and met with Osmun at

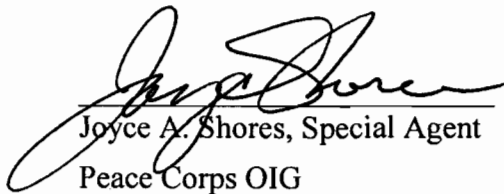


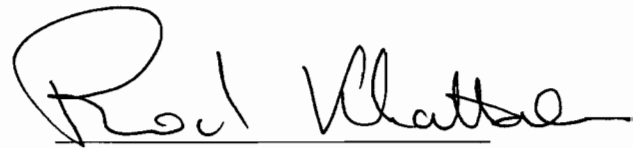
his residence. Osmun began to admit to us that he molested children at UAC and provide details about the molestation. We then advised Osmun of his Miranda rights. After executing a written Miranda waiver form, Osmun provided a written confession. In his written confession, Osmun admitted that he engaged in sexual contact with Minors #1, #2 and #3 for approximately one year. Osmun admitted that the children touched his penis with their hands and that possibly two of the children “used their mouths to touch my penis.” Osmun also admitted to sexual contact with another child whose name he could not recall. Finally, Osmun admitted to regular sexual contact with a child who is approximately five years old and whose name he provided in the written confession. Osmun admitted engaging in acts with this child twice a week for approximately five months. Osmun denied engaging in any sex acts with Minor #4.

23. Orally, Osmun admitted to us that he had confessed to the UAC deputy director that he inappropriately touched a child at UAC. He also admitted to the UAC program manager and the UAC director that he had a sexual attraction to children.

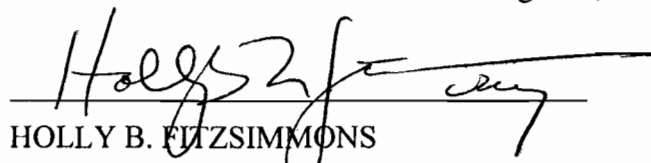
CONCLUSION

24. Based on the foregoing facts, there is probable cause to believe, and we do believe, that Jesse Osmun, a United States citizen, traveled to South Africa in January 2010 and subsequently engaged in illicit sexual conduct with multiple children who were all younger than six years of age in violation of Title 18, United States Code, Section 2423(c).

  
Joyce A. Shores, Special Agent  
Peace Corps OIG

  
Rod Khattabi, Special Agent  
Department of Homeland Security

Sworn and subscribed before me on August 4, 2011.

  
HOLLY B. FITZSIMMONS  
UNITED STATES MAGISTRATE JUDGE